



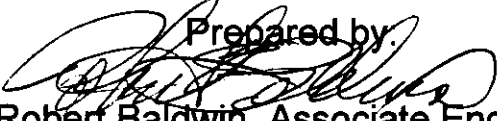
Air Quality Permitting Statement of Basis

April 11, 2006

Permit to Construct No. P-050053

Boise Building Solutions Manufacturing, L.L.C., Emmett

Facility ID No. 045 - 00001

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AIR QUALITY DIVISION

FINAL

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Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
PT	particulate matter
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
SIP	State Implementation Plan
SM	synthetic minor
SO₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

2. FACILITY DESCRIPTION

This facility is a specialty lumber manufacturing plant (which includes the manufacture of laminated beams).

The specialty lumber manufacturing process consists of a fingerjointing process and laminated beam manufacturing process. The fingerjointing process connects individual boards end to end to produce laminated beam stock of variable lengths. Trimmed wood byproducts generated by the process are sent through a hog, transferred pneumatically to a cyclone, and then to a shavings bin baghouse. Beam stock is sent by truck to the laminated beam plant which applies adhesive resin to the entire surface of the beam stock, stacks the beam stock in a manual jig, and cures it overnight. The cured beams are removed from the jigs, planed, sanded or textured, and cut to length by the beam trim saw. The trimmed beam is wrapped to produce the product.

3. FACILITY / AREA CLASSIFICATION

The facility is classified as a synthetic minor facility because, without permit limits on the potential to emit, emissions of PM₁₀ could exceed 100 tons per year. The AIRS classification is "SM" because the potential to emit of PM and PM₁₀ is below major source levels. The Standard Industrial Classification for the specialty lumber portion of the facility is 2421, which refers to establishments primarily engaged in sawing rough lumber, timber form logs, bolts, or resawing cants and flitches into lumber. This includes box lumber and softwood cut stock, planing mills combined with sawmills, and separately operated planing mills which are engaged primarily in producing surfaced lumber and standard workings or patterns of lumber.

The facility is located within AQCR 63 and UTM zone 11. The facility is located in Gem County which is designated as attainment or unclassifiable for all criteria pollutants.

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at the facility. This required information is entered into the EPA AIRs database.

4. APPLICATION SCOPE

Boise Building Solutions Manufacturing, LLC has submitted a PTC application to revise the facility's existing permit. As requested, the Responsible Official is to be identified as the Facility Manager and the Facility Contact is to be identified as the Regional Environmental Engineer. This request is made because these positions change frequently (i.e. approximately every four months).

4.1 Application Chronology

December 12, 2005	DEQ received application
January 11, 2006	DEQ activated application
January 31, 2006	DEQ determined application complete
March 13, 2006	DEQ sent Boise Building Solutions a draft permit

April 4, 2006

DEQ received a comment response from Bart Barlow from Boise Building Solutions

April 6, 2006

DEQ received a comment response from Boise Regional Office

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC action.

5.1 Equipment Listing

No equipment changes are associated with this PTC revision.

5.2 Emissions Inventory

There is not an increase emissions associated with this PTC revision. Therefore, an emissions inventory is not required.

5.3 Modeling

A modeling analysis is not required for this PTC revision because there is not an increase in emissions.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.209.04..... Revisions to Permits to Construct

This rule establishes the requirements for permit revisions. Because emissions are not increasing, a public comment period is not required.

5.5 Permit Condition Review

All permit conditions remain unchanged for this PTC revision.

6. PERMIT FEES

A PTC processing fee is not required for this PTC revision.

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

The Boise Regional office was provided the draft permit for review on March 13, 2006. The Boise Regional Office's response was received on April 6, 2006 with no comments.

7.2 Facility Review of Draft Permit

A draft permit review was request by the facility. A draft permit was sent to the facility on March 13, 2006. The Boise Building Solution's response was received on April 4, 2006, from Bart Barlow regarding a typographical error in the statement of basis. The error was corrected.

7.3 Public Comment

A PTC revision to a minor facility that does not include an emissions increase is not required to be provided for an opportunity for public comment.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that Boise Building Solutions Manufacturing, L.L.C. be issued final PTC No. P-050053 for the revisions requested from the facility. No public comment period is required, no entity has requested a comment period, and the project does not involve PSD requirements.

REB/bf Permit No. P-050053

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Appendix A

AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: Boise Building Solutions Manufacturing, L.L.C.
Facility Location: Emmett
AIRS Number: 045 – 00001

AIR PROGRAM								AREA CLASSIFICATION
POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	A-Attainment U-Unclassified N- Nonattainment
SO ₂	B							U
NO _x	B							U
CO	B							U
PM ₁₀	SM						SM	U
PT (Particulate)	SM						SM	U
VOC	B							U
THAP (Total HAPs)	B							U
			APPLICABLE SUBPART					

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).